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1	Charles R. Zeh, Esq.
	State Bar No: 1739
2	Pete Cladianos III, Esq.
	State Bar No: 8406
3	The Law Offices of Charles R. Zeh, Esq.
	50 West Liberty Street, Suite 950
4	Reno, NV 89501
	Phone: 775.323.5700
5	Fax: 775.786.8183
	e-mail: crzeh@aol.com
6	
	Attorneys for defendants
7	Debashis Bagchi and Jon Bengtson
8	
9	IN THE UNITED S

STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

Jaime Martorell, an individual

Plaintiff.

VS.

Debashis Bagchi, an individual and Jon Bengtson, an individual,

Defendants.

CASE NO.: 3:19-cv-00523-MMD-CLB

Stipulation for Extension of Time to File the Joint Pretrial Order

(Third Request)

STATUS REPORT

The parties are working cooperatively towards preparing the Joint Pretrial Order. Plaintiff has supplied its draft to Defendants on September 8, 2022. Plaintiff's draft Joint Pretrial Order lists nine witnesses and reserves the right to call any witnesses of Defendants, lists one hundred eightytwo documents to be marked as potential exhibits, provides eight contested issues of fact and five contested issues of law. Defendants are in the process of completing their draft of the Joint Pretrial Order; however, once Defendants' draft is complete, it will need to be submitted Plaintiff for his consideration and, possibly, reconciliation between the drafts. Considering these document exchanges and reviews and the complex nature of the case, the number of exhibits involved, and the schedule of counsel, the parties respectfully request an additional twenty-one (21) days within

1 which to file the Joint Pretrial Order. 2 STIPULATION AND ORDER 3 Plaintiff Jaime Martorell ("Plaintiff" or "Martorell") and Defendants Debashis Bagchi and 4 Jon Bengston ("Defendants") (collectively, at times, the "Parties"), by and through their respective 5 counsel, hereby stipulate and agree to extend the time for the filing of the Proposed Joint Pretrial 6 Order for an additional twenty-one (21) days from September 12, 2022 to October 3, 2022. 7 The parties continue to work cooperatively to prepare a Proposed Joint Pretrial Order, but 8 additional time is needed to complete the document. This short extension is therefore requested. 9 This is the third request of an extension of time to file a Proposed Joint Pretrial Order. 10 11 Dated: September 9, 2022 Dated: September 9, 2022 12 13 By: _/s/Anthony Hall, Esq. By: /s/ Pete Cladianos III, Esq. Pete Cladianos III, Esq. Anthony Hall, Esq. 14 Nevada State Bar No. 8406 Nevada State Bar No. 13849 The Law Offices of Charles R. Zeh, Esq. Simons Hall Johnston PC 15 50 West Liberty Street, Suite 950 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89501 Reno, NV 89509 16 Attorneys for plaintiff Attorneys for defendants 17 18 ORDER 19 IT IS SO ORDERED. 20 Dated this 9th day of September , 2022. 21 22 United States District Court Judge 23 S:\Clients\Airwire Technologies\Federal 3 19-cv-00523\Pleadings\Stipulation.Extension.Time pretrail order.R2_mtd.wpd 24 25 26 27

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